

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AYALA and MOSHE NIV

Plaintiff,

v.

FEDERAL NATIONAL
MORTGAGE ASSOCIATION
a/k/a FANNIE MAE

Defendants.

**CIVIL ACTION NO.: 1:25-cv-01570-
KMW-AMD**

**FEDERAL NATIONAL MORTGAGE
ASSOCIATION’S REQUEST FOR
EXTENSION OF TIME TO ANSWER,
MOVE OR OTHERWISE RESPOND TO
PLAINTIFFS’ COMPLAINT,
PURSUANT TO LOCAL CIVIL RULE
6.1(b)**

**DEFENDANT FEDERAL NATIONAL MORTGAGE ASSOCIATION’S REQUEST FOR
EXTENSION OF TIME TO ANSWER, MOVE OR OTHERWISE RESPOND AS TO
PLAINTIFFS’ COMPLAINT**

Pursuant to Local Civil Rule 6.1(b), Defendant named as Federal National Mortgage Association a/k/a Fannie Mae, more properly pled as Federal National Mortgage Association (hereinafter referred to as “Fannie Mae”), respectfully requests an extension of time to Answer, Move or Otherwise Respond as to the Complaint of Plaintiffs Ayala and Moshe Niv (“Plaintiffs”) in this matter and in support thereof states as follows:

1. On February 18, 2025, Plaintiffs Ayala and Moshe Niv (“Plaintiffs”) initiated a civil action against Fannie Mae pending in the Superior Court of New Jersey, Civil Division, Camden County, Docket No. CAM-L-000528-25.
2. The Complaint was served on Fannie Mae on February 19, 2025.

3. This matter was removed to the United States District Court for the District of New Jersey on February 28, 2025¹. Pursuant to the Federal Rules of Civil Procedure, the time for Defendant to Answer, Respond or Otherwise Move as to the Complaint is March 21, 2025.
4. Defendant Fannie Mae respectfully requests an (automatic) extension of time to Answer, Move or Otherwise Respond as to the Complaint for fourteen days, or until April 4, 2025 so that counsel can thoroughly investigate/analyze the allegations in the Complaint and work with their client to Answer, Move, or Otherwise Respond to the Complaint.
5. Defendant Fannie Mae respectfully submits that no party would be prejudiced if the Court grants this Defendant a short extension of time to Answer, Move, or Otherwise Respond as to the Complaint. This is the first extension of time requested.

WHEREFORE, Defendant Fannie Mae respectfully requests an extension of time until April 4, 2025, to Answer, Move or Otherwise Respond as to Plaintiff's Complaint.

Respectfully submitted,

Dated: March 7, 2025

By: /s/ John M. McConnell
John M. McConnell, Esq.
Attorney for Defendant
Federal National Mortgage Association
301 Carnegie Center Drive Suite 200
Princeton, NJ 08540
T: 609.986.1326
F: 609.986.1301
Email: jmcconnell@goldbergsegalla.com

¹ An Amended Notice of Removal was filed on March 5, 2025.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AYALA and MOSHE NIV,

Plaintiff,

V.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION a/k/a FANNIE MAE

**CIVIL ACTION NO.: 1:25-cv-01570-
KMW-AMD**

ORDER

THIS MATTER HAVING been brought before the Court by Defendant Federal National Mortgage Association a/k/a Fannie Mae, more properly pled as Federal National Mortgage Association (hereinafter referred to as “Fannie Mae”), respectfully seeking entry of an Order granting a fourteen day extension for Defendant Fannie Mae to Answer, Move, or otherwise Respond to the Complaint of Plaintiffs Ayala and Moshe Niv (“Plaintiffs”); and for good cause shown:

IT IS on this _____ day of _____, 2025,

ORDERED that Defendant Fannie Mae's time to Answer, Move or otherwise Respond to the Complaint of Plaintiffs Ayala and Moshe Niv ("Plaintiffs") is hereby extended to April 4, 2025.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AYALA and MOSHE NIV,

Plaintiff,

v.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION a/k/a FANNIE MAE

Defendants.

:
:
: **CIVIL ACTION NO.: 1:25-cv-01570-**
: **KMW-AMD**
:

: **CERTIFICATE OF SERVICE**
:
:
:
:
:

CERTIFICATE OF SERVICE

I, John M. McConnell, hereby certify that a true and correct copy of Defendant's Application for an Extension of Time to Answer, Move, or Otherwise Respond as to the Complaint of Plaintiffs was electronically filed with the Court on March 7, 2025 and available through the court's CM/ECF system to all counsel of record. Parties may access this filing through the court's CM/ECF system.

Date: March 7, 2025

By: /s/ John M. McConnell
John M. McConnell, Esq.
Attorney for Defendant
Federal National Mortgage Association
301 Carnegie Center Drive, Suite 200
Princeton, NJ 08540
T: 609.986.1326
F: 609.986.1301
Email: jmcconnell@goldbergsegalla.com